



104(e) Letter Response Summary **Work Assignment ES002** Lower Darby Creek Area Site



The Boeing Company

Prepared for:

U.S. Environmental Protection Agency Region III

Enforcement Support Services Hazardous Site Cleanup Division 1650 Arch Street Philadelphia, PA 19103

Prepared by:

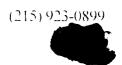
DASTON Corporation

8245 Boone Boulevard Suite 704 Vienna, Virginia 22182

Work Assignment Number: Date Submitted: Contract Number: EPA Work Assignment Manager: Telephone Number: DASTON Work Assignment Manager:

ES002 August 21, 2001 68-S3-01-01 Carlyn Prisk (215) 814-2625 Eric D. Bailey

Telephone Number:





104(e) Letter Response Summary

Company Name	The Boeing Company		
Response Date	July 2, 2001		
Receipt Date	July 5, 2001		
Company Ownership	The Boeing Company (Respondent) is the parent company and current owner (as of the end of FY 2000) of 233 subsidiaries (as listed in Attachment 1, Boeing's 10-K for FY 2000)		
Hazardous Wastes Identified	None; however, Attachment 2 included a list of materials released to hauling/disposal contractors, including waste treatment plant sludge released to Eastern Industrial Corporation during 1976-1977. A list of waste released to other companies included septic, waste water with paint solids and oils, waste oil, acid-alkalines with and without solvents and cyanides, although these may not be related to the Site area.		
Transporters Used	Eastern Industrial - Respondent identified 2 purchase orders for Eastern Industrial involving "removal of trash and waste." (See Attachment 2). One of the purchase orders indicates that sewage treatment plan sludge was transported to Knickerbacker Landfill in Malvern, PA.		
Additional PRPs Identified	None; however, Respondent identified Vertol Aircraft Corporation, which it purchased in 1960, as prior owner of the current Philadelphia Boeing operations.		
Unanswered Questions	• None		



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Incomplete or Insubstantial Answers	 (3) Unable to locate relevant information (4e) Unable to locate relevant information (5) General objection to over-broad/burdensome nature of inquiry (6) General objection to over-broad/burdensome nature of inquiry (7) General objection to over-broad/burdensome nature of inquiry (8b, c, d, e, f, g, h, i) Unable to locate relevant information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders (9) No evidence that required information exists (10) No evidence that required information exists (11) No evidence that required information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders (13) No evidence that required information exists (14) No evidence that required information exists (15) Unable to locate relevant information exists (16) Unable to locate relevant information beyond that contained in a July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol (see Attachment 2), consisting of information gleaned from 2 purchase orders, which are believed to have been destroyed. Archived microfilm is unidentifiable. (16d) No specific information provided
Contact	Taralyn Trimpey Counsel The Boeing Company P.O. Box 516 Mail Code S100-3340 St. Louis, MO 63166-0516 (314) 232-3269
Attachments	 Attachment 1, Form 10-K, for Fiscal Year 2000 Attachment 2, July 11, 1977 letter from EPA and an August 19, 1977 response from Boeing Vertol Attachment 3, Master Records Retention Schedules D-200-10050-2 Revision



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Comments	Respondent included very little useful information in the 104(e) letter response, citing general objections to the "over-broad, unreasonable, and unduly burdensome nature of the questions." A potential issue is that Boeing has microfilm records of all purchase orders and financial records, but they are described as generally unidentifiable based on "time period, purchase order or other relevant identifying information (see response to Question 16).
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